



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

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MEMORANDUM

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Date: May 29, 1992

Subject: Risk review comments on ecological aspects, Olin Corporation, McIntosh Plant NPL site, Alabama.

From: Lynn H. Wellman, ETAG Coordinator *LHW*

Thru: Elmer Akin, Chief *EAP*
Office of Health Assessment
Waste Management Division

To: Cheryl W. Smith, Remedial Project Manager
South Superfund Remedial Branch

Per your request, I have reviewed the **Preliminary Site Characterization Summary, Remedial Investigation/Feasibility Study** document for the Olin Corporation, McIntosh Plant Site NPL site, Alabama. My comments provided below are divided into two sections, i.e., (1) comments specifically to you the RPM and (2) comments that, if you concur, can be conveyed verbatim to the party responsible for preparation of the document. To facilitate the verbatim conveyance, I will be pleased to provide on request a copy of this memo in Word Perfect format via cc: mail.

General Comments to the RPM

It is the policy of the EPA Region IV Office of Health Assessment to require written responses to review comments provided by this office. If a meeting with the PRP is to be held to discuss these comments, we request that written responses be provided prior to such a meeting. We also request that any risk assessment comments received from the State or any other source be provided to the Office of Health Assessment for our site file. If risk comments from sources other than this office are forwarded to the PRP contractor, the source should be clearly identified unless concurrence of this office is sought. In this case, we should formally review these comments and provide you with our responses before they are forwarded.

My first comment concerns the endangered and threatened species survey. The United States Fish and Wildlife Service and the appropriate Alabama state agency should be contacted for historical information concerning past sightings and critical habitat requirements for this site. A list of threatened and endangered species is contained in the report and the statement is made that none of these species were sighted. Threatened and endangered species are rare by definition and may not be identified

Memorandum to Cheryl W. Smith
Olin Corporation, McIntosh Plant NPL site, Alabama
May 29, 1992

by limited field reconnaissance. Other federal (National Oceanographic and Atmospheric Administration) and state trustees should also be notified of the investigation activities being conducted at this site.

My second comment concerns the chlorinated pesticides detected in the surface water, sediment, and biota in the basin. Although Olin's facility is not considered to be the source of this contamination, the extent of chlorinated pesticide contamination must be determined and the ecological risk associated with the levels of these contaminants must be addressed. The source of the contamination may affect the consideration of remedial options but does not its potential ecological effects.

My third comment concerns the preliminary comparison of the contaminant levels to benchmark values. The report contains comparisons of the contaminant levels to human health benchmark values (MCLs). If preliminary evaluation is to be a component of this document, the comparison of contaminant levels to values of ecological significance (e.g. screening values or benchmark values) should be contained in this report.

My remaining comments (4, 5, and 6) refer to typographical errors or editorial comments.

Comments to be Conveyed to the Responsible Party

1. Preliminary Survey of Vegetation, Page 39; 2.2.5 Vegetative Stress Survey, Page 50; and Endangered and Threatened Species, Page 133 - The United States Fish and Wildlife Service, as well as the appropriate Alabama state agency, should be contacted for information concerning past or historic sightings, etc., for threatened and endangered species, and critical habitats. If a review of these agencies' databases has been conducted, it should be stated in the report. Additional federal (National Oceanographic and Atmospheric Administration) and state trustees should be contacted to determine their concerns and notified of the investigations taking place.
2. Horizontal Extent of Organic Constituents, Page 115; 4.2.5.3 Fish Sampling Results, Page 140 - Olin's facility is not thought to be the source of the DDT, DDD, and DDE contamination in the basin, therefore these compounds would not be appropriate chemicals to choose to describe the extent of contamination emanating from the facility. However the extent and distribution of DDT, DDD, and DDE contamination should be investigated and its contribution to the ecological

Memorandum to Cheryl W. Smith
Olin Corporation, McIntosh Plant NPL site, Alabama
May 29, 1992

risk addressed.

3. General Comment - A preliminary assessment of the contaminant levels is made based on comparison of sampling data to human health benchmark values (MCLs). Similar comparisons should be made to ecological screening values (e.g. Region IV Waste Management Division Screening Values for Surface Waters and Sediments for Hazardous Wastes Sites) or benchmark values.
4. 4.2.5.2 Benthic Macroinvertebrates, Pages 137-138, Typographical Error - The sentence on the bottom of page 137 is repeated on the top of page 138.
5. 4.2.5.3 Fish Sampling Results, Page 139; Table 4, Summary of 1986 Fish Sample Results - Identify the fish species using the scientific name in addition to the common name, as in the vegetation and invertebrate sections.
6. Table 15, Vascular Plant Species Found in Operable Unit 2, Typographical Error - "Quercus phellow" should be identified as Quercus phellos. "U:mus alata" should be Ulmus alata. The last page of the table is repeated twice.